

# **Contract & Construction Consultants Privacy Policy**

Please note that by providing your personal data to us and/or using our website you give your consent that the personal data that you have provided may be processed by us as set out in this Privacy Policy. We are committed to protecting your privacy.

#### Introduction and who we are

- 1. This Privacy Policy ("the Policy") describes the way in which we process the personal data that we are provided with and explains how we will collect, store and use any personal data that is provided to us. Please ensure that you read this Policy.
- 2. This Privacy Policy applies to Contract & Construction Consultants Limited (company number 04058085) and to Contract & Construction Consultants (Southern) Limited (company number 07191325) ("we", "us", "our", "CCC" or "Contract & Construction Consultants").
- 3. This Policy applies to all personal data that we receive howsoever it is provided. This may be from our website, electronic communications (email), communications received by telephone (including mobile telephones, SMS), communications received by post, or networking and in any other way you communicate with us in the course of running our business and in relation to the services that we provide.
- 4. It may be necessary for this Policy to be amended from time to time. The most up to date version of this Policy is available to access on our website (<a href="www.contract-consultants.com">www.contract-consultants.com</a>) or can be provided upon request. Any updates to this Policy are of immediate effect when published on our website.
- 5. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data, we may not be able to perform the contract we have or are trying to enter into with you. We may have to terminate a contract with you if you do not provide the data required to perform the contract. We will notify you if this is the case at the time.
- 6. You have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. We would, however, be grateful to have the opportunity to deal with your concerns before you contact the ICO and request that you contact us in the first instance.

# Your information and how we process it

- 7. When you contact or instruct us, we will require personal information about you. The information that you provide to us may be manually and/or electronically stored.
- 8. We may collect and process information about you and your personnel through any of the following:
  - 8.1. In the course of carrying out work for you (or your business);
  - 8.2. By email or other electronic communications;
  - 8.3. Via our website;
  - 8.4. By telephone;
  - 8.5. Networking;
  - 8.6. Otherwise through providing our services or operating our business.
- 9. The personal data that we receive may include:
  - 9.1. Your name;
  - 9.2. Your job title;
  - 9.3. Contact information that you share with us. This may include, for example, email address, telephone number, and postal address;
  - 9.4. Information that you submit through our website;
  - 9.5. Any other personal data that we collect in the context of our work or in the course of operating our business.
  - 9.6. Details relevant to your employment or applications for employment at CCC, for example, date of birth, address, qualifications, employment history, National Insurance number.
  - 9.7. Where required, signature(s) and financial details such as bank account details.

- 9.8. Where required, data relating to health (including disabilities), ethnicity, race, religious beliefs, trade union membership and other 'special category personal data'.
- 10. We will only ask for data that is adequate, relevant and not excessive for their intended purposes.
- 11. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

# Data collected through our website and cookies

- 12. In addition to the information described above, we use technology to collect anonymous information about the use of our website.
- 13. For example, when someone visits www.contract-consultants.com we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to understand how our website is being used and to make improvements. This information is only processed in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.
- 14. In order to collect the anonymous data we may use cookie technology on our website. You can set your browser to notify you when you receive a cookie and you can choose whether to accept this or not. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### How we will use your information

- 15. We will only use your personal data when the law allows us to. The most common ways that we will use your personal data include the following:
  - 15.1. Where you have contacted us and asked us for information or for us to contact you.
  - 15.2. In order to perform the contract we have entered into with you, or are about to enter into with you.
  - 15.3. Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

- 15.4. Where we need to comply with a legal obligation.
- 16. More specifically this may include:
  - 16.1. To provide our services and other information to you;
  - 16.2. To contact you about our services or events;
  - 16.3. To send you updates on issues we think will be of interest to you;
  - 16.4. In relation to or arising from our our events;
  - 16.5. To respond to any query that you submit to us;
  - 16.6. To manage our relationship with you including by maintaining our database of client;
  - 16.7. To carry out any conflict checks;
  - 16.8. To process any job application you (or your representative) has submitted;
  - 16.9. To administer our website and mailouts;
  - 16.10. To issue invoices, manage accounts and records and collection of payments and debts;
  - 16.11. As we feel is necessary to prevent illegal activity or to protect our interests.

### Legal basis for processing your information

- 17. Generally we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us.
- 18. The legal bases that are relevant to our processing of your information are:
  - 18.1. Performance of, or entry into, a contract. This relates to the personal data that we need to collect to comply with any professional and legal obligations and in order for us to perform this contract.
  - 18.2. Compliance with a legal obligation to which we are subject.

18.3. Where we have a legitimate interest in doing so as a legal services provider (and where our legitimate interests are not overridden by your own interests or fundamental rights or freedoms).

#### Unsubscribe

- 19. You have the right to object to the processing of your personal data for direct marketing purposes at any time.
- 20. If you do not wish to receive emails from us and want to be removed from our electronic mailing list, please email us at the address below with 'unsubscribe email' in the subject heading or use the unsubscribe option on any of our mailouts.
- 21. If you wish to be removed from our postal mailing list, please let us know by emailing us at the address below "unsubscribe mail' in the subject heading.
- 22. Our email address to process a request to unsubscribe is <a href="mailto:enquire@contract-consultants.com">enquire@contract-consultants.com</a> or you can write to us at 15 Whiteladies Road, Clifton, Bristol, BS8 1PB.
- 23. We will keep a record of any request to unsubscribe to ensure that future direct marketing communications are not sent to you.

### Disclosure and sharing of your personal data

- 24. We do not disclose, share, transfer, sell or distribute your personal data with or to third parties other than provided for in this Privacy Policy.
- 25. We may share your details with carefully selected third parties. These may include third parties instructed or required in order to enable us to fulfil our contractual obligations to you in the course of business.
- 26. If we share your information with third parties they will process your information as either a data controller or as our data processor and this will depend on the purposes of our sharing your personal data. We will only share your personal data in compliance with the European Data Protection Legislation.
- 27. We may disclose your information to third parties when:

- 27.1. You specifically request this;
- 27.2. Where it is necessary in order to provide our legal services to you.
- 27.3. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect the rights, property or safety of our website, our clients, or others.
- 28. The third parties that we may disclose your information to include:
  - 28.1. our bank;
  - 28.2. our insurers;
  - 28.3. other professional advisors or third parties with whom we engage as part of our work for our clients or who our clients separately engage in the same context;
  - 28.4. our data processors providing archiving and other IT and business support services. This also includes third parties such as Google and Dropbox who we use for email and cloud data storage;
  - 28.5. our email marketing platform provider and our website platform provider;
  - 28.6. analytics and search engine providers that assist us in the improvement and optimisation of our website; and
  - 28.7. any third party you ask us to share your data with.
- 29. We will not sell or transfer your data to any third parties for marketing purposes.

# Storage and retention of your personal data

- 30. We follow strict security procedures regarding the use and storage of your personal information and who sees it, to help stop any unauthorised person getting hold of it.
- 31. Once we have received your information, we use strict procedures and security features to try to prevent unauthorised access. Unfortunately, the transmission of information via the internet is not completely secure and although we do our best to protect your personal data, we cannot absolutely guarantee the security of your data.

- 32. We will keep your information stored on our systems for as long as it necessary to provide the services to you and in accordance with our Conditions of Engagement.
- 33. It may be necessary for us to keep your data for longer if we cannot delete it for legal or technical reasons. We may also keep it for conflict checks. If it is necessary to keep your data for longer we will ensure that safeguards are in place to protect your privacy and only used for those purposes.
- 34. The third parties we engage to provide services on our behalf will keep your data stored on their systems for as long as is necessary to provide the services to you.
- 35. Subject to paragraph 33, we will not store your information for longer than is reasonably necessary or required by law.

## Access to your data

- 36. You are entitled to make a subject access request if you require access to any of the data that we hold about you.
- 37. When we receive your written request and provide us with enough information to enable us to identify your personal data, we will disclose to you the personal data that we hold about you. We may charge you for this up to the maximum amount allowed in law.
- 38. Any subject access request will be dealt with in accordance with the guidelines provided by the ICO and in accordance with GDPR.
- 39. We will correct, amend or delete any personal data that is inaccurate.

### Contact

40. If you have any questions, comments or requests regarding this Policy then they should be sent to Contract & Construction Consultants, 15 Whiteladies Road, Clifton, Bristol, BS8 1PB, for the attention of the Directors. Email address is <a href="mailto:enquire@contract-consultants.com">enquire@contract-consultants.com</a>. Telephone number: +44 (0)117 925 9001.